

## **EXHIBIT A**

**PLAINTIFFS' DISCOVERY REQUESTS TO FCA –  
GEOGRAPHIC SCOPE AND SOURCES TO SEARCH**

\*For all the requests, in conjunction with ESI searches using custodians and search terms where appropriate, Defendants should also produce documents they otherwise know are responsive to the requests, but are not uncovered by the prescribed ESI searches.

**PLAINTIFFS' FIRST REQUEST FOR PRODUCTION OF DOCUMENTS:**

RFP #	RFP	National Scope?	Sources to Search	Request References Competing Dealer? <sup>1</sup>
1	All DOCUMENTS and COMMUNICATIONS that YOU reviewed and/or uncovered when “FCA US carried out an investigation of the facts”—as YOU stated in YOUR January 14, 2016 press release—with respect to “allegations of false sales reporting.”  <i>2<sup>nd</sup> MTC – internal investigation</i>	Yes	The set of relevant documents has already been identified. Produce responsive documents without geographic limitation.	
2	All DOCUMENTS and COMMUNICATIONS that YOU claim support YOUR defenses in YOUR Rule 26(a) disclosures.	Not Applicable (“NA”). <sup>2</sup>		
3	Records of all FALSE SALES REPORTS.  <i>2<sup>nd</sup> MTC – False Sales Reports</i>	Yes	The set of relevant documents has already been identified. Produce responsive documents without geographic limitation.	

<sup>1</sup> Plaintiffs’ proposed modified definition of “Competing Dealer” for purposes of Plaintiffs’ First and Second Requests for Production of Documents is labeled “Sales Locality Plus” and includes: “All dealers located in each Plaintiff’s Sales Locality for the period 1/1/2013 to 1/12/2016, plus the following nine additional dealers: Ron Lewis, Beaver County, Kasing Auto Sales Inc., Posner Park, Thomas Dodge Chrysler Jeep, Fields, Sherman DCJ, DuPage CDJ, and Wallace CJD.” Under this definition, there are approximately 43 “Competing Dealers.”

<sup>2</sup> Not Applicable (“NA”) means that FCA refuses to produce any responsive documents, and Plaintiffs reserve their rights to move to compel at a later date.

4	All DOCUMENTS and COMMUNICATIONS concerning an agreement, demand, idea, invitation, offer, plan, request, or suggestion to consider, contemplate, participate in, aid, execute, solicit, invite, agree to, reward, or conceal the creation or submission of FALSE SALES REPORTS. For the avoidance of doubt, the DOCUMENTS and COMMUNICATIONS reflecting the following indicia of a plan to execute and/or conceal a false reporting scheme are responsive to this REQUEST: ...	Yes	Search the limited number of custodians agreed to by the parties or ordered by the court.	
5	DOCUMENTS and COMMUNICATIONS sufficient to show how unwinding a SALES REPORT affects (i) the sales and financial figures YOU report to the investing public or YOUR creditors, (ii) the bonuses YOU pay to YOUR business center directors and their direct supervisors and reports, and (iii) the warranties for new vehicles initially reported sold.  <i>2<sup>nd</sup> MTC – False Sales Reports</i>		Draw from FCA documents to select those “ <i>sufficient to show</i> ” the requested information.	
6	All DOCUMENTS and COMMUNICATIONS concerning the allegations in paragraphs 38(a)-(h) and 42 of the PLAINTIFFS’ amended complaint (including, for the avoidance of doubt, DOCUMENTS and COMMUNICATIONS memorializing, reflecting, referencing, commenting upon, corroborating, supporting, or disagreeing with any of the allegations in these paragraphs).		Search the limited number of custodians agreed to by the parties or ordered by the court.	
7	All DOCUMENTS and COMMUNICATIONS concerning FALSE SALES REPORTS or unwinding of FALSE SALES REPORTS involving YOUR dealers, including Sherman CDJR; Northwestern CDJR; Glendale CDJR; Royal Gate CDJR; and South County CDJR.	Yes	Search the limited number of custodians agreed to by the parties or ordered by the court.	

8	All DOCUMENTS and COMMUNICATIONS concerning the Volume Growth Program in connection with the PLAINTIFFS and COMPETING DEALERS from January 1, 2012 to the present, including those concerning: . . .		Search the limited number of custodians agreed to by the parties or ordered by the court, plus a reasonable search for responsive documents related to Plaintiffs and “Competing Dealers.”	Yes
9	DOCUMENTS sufficient to show monthly new vehicle sales data for each type of Chrysler, Dodge, Jeep and Ram vehicle sold in the United States from January 1, 2012 to the present.	Yes	Responsive information can be automatically generated from a database.	
10	All DOCUMENTS and COMMUNICATIONS concerning the Minimum Sales Responsibilities of the PLAINTIFFS and any component used to calculate their Minimum Sales Responsibilities, including those concerning: . . .		Search the limited number of custodians agreed to by the parties or ordered by the court.	
11	DOCUMENTS sufficient to show (i) the incentives, monies, and subsidies that YOU distributed to each PLAINTIFF and each COMPETING DEALER on a monthly basis; (ii) the accounts under which YOU distributed such incentives, monies, and subsidies; and (iii) why YOU distributed or withheld such incentives, monies, and subsidies and why YOU chose to do so under certain accounts. For the avoidance of doubt, this REQUEST extends to co-op and advertising monies.  <i>2<sup>nd</sup> MTC – Competing Dealers</i> <i>2<sup>nd</sup> MTC – misc.</i>		Draw from FCA documents to select those “ <i>sufficient to show</i> ” the requested information.	Yes
12	DOCUMENTS and COMMUNICATIONS sufficient to show (i) the numbers of vehicles by make and model that YOU allocated to PLAINTIFFS or COMPETING DEALERS on a monthly basis (including advertising and co-op monies); (ii) what methodology YOU employed in allocating such		Draw from FCA documents to select those “ <i>sufficient to show</i> ” the requested information.	Yes

	vehicles to the PLAINTIFFS and COMPETING DEALERS; (iii) how and why YOU allocated or distributed such vehicles to each PLAINTIFFS and COMPETING DEALER; and (iv) how and why YOU withheld or did not provide additional vehicles to any PLAINTIFF or COMPETING DEALER.  <i>2<sup>nd</sup> MTC – Competing Dealers</i> <i>2<sup>nd</sup> MTC – misc.</i>			
13	All DOCUMENTS and COMMUNICATIONS referencing or exchanged with Edward F. Napleton.		Conduct a reasonable search for responsive documents.	
14	All DOCUMENTS and COMMUNICATIONS concerning the termination or default of the PLAINTIFFS under their franchise agreements or that discuss, analyze, evaluate, or threaten the performance or compliance of the PLAINTIFFS with their franchise agreements.		Conduct a reasonable search for responsive documents.	

**PLAINTIFFS' SECOND REQUEST FOR PRODUCTION OF DOCUMENTS:**

RFP #	RFP	National Scope?	Sources to Search	Request References Competing Dealer?
1	All DOCUMENTS, regardless when created, that YOU have provided to any governmental entity as part of any "investigation into the reporting of vehicle unit sales to end customers in the U.S." (See 7/18/16 FCA press release, attached as Exhibit B.) For the avoidance of doubt, this REQUEST does not call for the production of DOCUMENTS that were solely provided to a grand jury and not to any other governmental entity, but does call for the production of	Yes	The set of relevant documents has already been identified. Produce responsive documents without geographic limitation.	

	DOCUMENTS that were provided to both a grand jury and another governmental entity.  <i>1<sup>st</sup> MTC – government documents</i>			
2	All DOCUMENTS, regardless when created, that YOU provided to any governmental entity (including any grand jury) concerning (i) SALES REPORTS, (ii) FALSE SALES REPORTS, (iii) the Volume Growth Program, (iv) Minimum Sales Responsibilities, (v) any of the PLAINTIFFS, (vi) any of the COMPETING DEALERS, (vii) Reid Bigland, (viii) Sergio Marchionne, (ix) any of the individuals identified in the parties' Initial Rule 26(a) disclosures exchanged on March 25, 2016, (x) the activities of the Business Centers in Illinois, Florida, Missouri, Pennsylvania, and Colorado, (xi) incentives that YOU or YOUR employees offered to any dealer to sell vehicles, report vehicles as sold, or unwind any vehicles reported as sold, (xii) YOUR "turn and earn" program or any program that rewarded past sales with inventory of popular vehicles, (xiii) any cooperative advertising program, (xiv) the unwinding of any SALES REPORT, and (xv) the accuracy of the unit sales and revenues that YOU reported to the public.  <i>1<sup>st</sup> MTC – government documents</i> <i>2<sup>nd</sup> MTC – Competing Dealers</i>	Yes	The set of relevant documents has already been identified. Produce responsive documents without geographic limitation.	Yes
3	All subpoenas, requests for information, or civil investigative demands issued to YOU or any of YOUR employees by any governmental entity (other than a grand jury) as part of any “investigation into the reporting of vehicle unit sales to end customers in the U.S.”  <i>1<sup>st</sup> MTC – government documents</i>	Yes	The set of relevant documents has already been identified. Produce responsive documents without geographic limitation.	

4	<p>All DOCUMENTS reflecting or referring to any interview or testimony involving YOU, YOUR employees, or any COMPETING DEALER that a government entity has requested, commanded, or conducted as part of any "investigation into the reporting of vehicle unit sales to end customers in the U.S."</p> <p><i>1<sup>st</sup> MTC – government documents</i>  <i>2<sup>nd</sup> MTC – Competing Dealers</i></p>	Yes	Search the limited number of custodians agreed to by the parties or ordered by the court, plus a reasonable search for responsive documents related to "Competing Dealers."	Yes
5	<p>All DOCUMENTS reflecting or referring to any raid, search, or seizure that a government entity conducted on YOU, YOUR employees, or any COMPETING DEALER as part of any "investigation into the reporting of vehicle unit sales to end customers in the U.S."</p> <p><i>1<sup>st</sup> MTC – government documents</i>  <i>2<sup>nd</sup> MTC – Competing Dealers</i></p>	Yes	Search the limited number of custodians agreed to by the parties or ordered by the court, plus a reasonable search for responsive documents related to "Competing Dealers."	Yes
6	<p>All DOCUMENTS that YOU reviewed, uncovered, or identified as relevant as part of any internal "investigation into the reporting of vehicle unit sales to end customers in the U.S."</p> <p><i>2<sup>nd</sup> MTC – internal investigation</i></p>	Yes	The set of relevant documents has already been identified. Produce responsive documents without geographic limitation.	
7	<p>All DOCUMENTS, regardless when created, that form the factual basis for any and all statements made in YOUR press release of July 26, 2016 (attached hereto as Exhibit C).</p> <p><i>2<sup>nd</sup> MTC – internal investigation – GRANTED</i></p>	Yes	The set of relevant documents has already been identified. Produce responsive documents without geographic limitation.	
8	All documents produced in <i>Delucca ...</i>	NA		
9	Settlement agreement in <i>Delucca ...</i>	NA		
10	All documents produced in <i>Mathew Enterprise ...</i>	NA		

11	All documents produced in <i>Recovering Racing ...</i>	NA		
12	All documents produced in <i>Northwestern Chrysler ...</i>	NA		
13	Each and every notice of default or termination letter that YOU sent to PLAINTIFFS or any COMPETING DEALER.  <i>2<sup>nd</sup> MTC – Competing Dealers</i>		Conduct a reasonable search for responsive documents.	Yes
14	All DOCUMENTS reflecting or referring to (i) the phrase “unnatural acts”; (ii) an “unnatural acts department” and/or any activities of an “unnatural acts department”; or (iii) any phrase any of YOUR employees used as a synonym for “unnatural acts” or the “unnatural acts department”.  <i>2<sup>nd</sup> MTC – unnatural acts</i>	Yes	Search the limited number of custodians agreed to by the parties or ordered by the court, plus additional custodians FCA knows are likely to have responsive documents.	
15	All DOCUMENTS reflecting or referring to YOUR year-on-year vehicle sales; the reporting of YOUR year-on-year vehicle sales; or any plan, policy or idea to increase or avoid the decrease of YOUR year-on-year vehicle sales.  <i>2<sup>nd</sup> MTC – misc</i>		Search the limited number of custodians agreed to by the parties or ordered by the court, plus additional custodians FCA knows are likely to have responsive documents.	
16	All DOCUMENTS reflecting or referring to YOUR month-after-month vehicle sales; the reporting of YOUR month-after-month vehicle sales; or any plan, policy or idea to increase or avoid the decrease of YOUR month-after-month vehicle sales.  <i>2<sup>nd</sup> MTC – misc.</i>		Search the limited number of custodians agreed to by the parties or ordered by the court, plus additional custodians FCA knows are likely to have responsive documents.	
17	All DOCUMENTS concerning YOUR public allegation that PLAINTIFFS are "disgruntled dealers who have failed to perform their obligations under the dealer agreements they signed with FCA US."		Conduct a reasonable search for responsive documents.	

18	All DOCUMENTS involving Shaun Mirabal, Carlo Jimenez, Robert Weaver, or any other FCA employee (including trainees) concerning the false reporting of vehicle sales by any FCA employee (including trainees).		Search the limited number of custodians agreed to by the parties or ordered by the court.	
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